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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**SUPPLEMENTAL DECLARATION OF  
RACHEL BORRA IN SUPPORT OF  
DEFENDANTS' COMPLIANCE WITH  
SEPTEMBER 12, 2025, ORDER ON  
CROSS MOTIONS FOR SUMMARY  
JUDGMENT – re: CORRECTIVE  
NOTICES AND CORRECTIONS TO SF-  
50s**

1 I, Rachel Borra, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer for the U.S. Department of the Interior  
3 ("Department"), headquartered in Washington, D.C. I have served in this position since  
4 September 29, 2025. I make this declaration based on my own personal knowledge, on  
5 information contained in the records of the Department, or on information provided to me by  
6 Department employees.

7 2. In my role at the Department, I am responsible for personnel management. I have  
8 the responsibility of overseeing the personnel enterprise and tracking and recording of personnel  
9 actions, including terminations. I assist in ensuring that all personnel actions comply with federal  
10 law, including those related to probationary and trial period appointees.

11 3. I have received and read the District Court's September 12, 2025 Order on Cross  
12 Motions for Summary Judgment ("September 25, 2025 Order") in the above-referenced matter.

13 4. The Department of Interior did not retroactively terminate probationary  
14 employees.

15 5. In late April/early May, 2025, following the District Court's April 18, 2025 Order  
16 on Motion for Preliminary Injunction by Union Plaintiff's and State of Washington ("April 18,  
17 2025 Order"), DOI's Office of Human Capital instructed all Bureaus/Offices to issue a  
18 subsequent individual written notice to all probationers terminated pursuant to OPM's February  
19 instruction that their termination was not performance or conduct based. See Decl. of Stephanie  
20 Holmes, Dated May 5, 2025.

21 6. Following the District Court's July 23, 2025, Notice Regarding Preliminary  
22 Injunction Compliance ("July 23, 2025 Notice"), DOI's Office of Human Capital instructed all  
23 Bureaus/Offices to confirm that individual written correction notices were issued in compliance  
24 with the April 18, 2025, Order.

25 7. All DOI Bureau/Offices issued a subsequent individual written notice to all  
26 probationers, terminated pursuant to OPM's February 2025 instruction, that their termination was  
27 not performance or conduct based.

Dated: November 18, 2025

Supplemental declaration of Rachel Borra in support of defendants' compliance with September 12, 2025, order on cross motions for summary judgment – re: corrective notices and corrections to sf-50s  
3:25-cv-1780-WHA



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

November 14, 2025

Dear [REDACTED]

This corrective notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, U.S. Department of the Interior informs you that you were not terminated on the basis of your personal performance.

As required by Paragraph 3 of that order, U.S. Department of the Interior has updated your personnel file, including your SF-50, to reflect that your termination was not performance or conduct based.

Sincerely,

*Rachel Borra*

Rachel Borra  
Chief Human Capital Officer